

Before the
Federal Communications Commission

In the Matter of)
)
Advanced Television Systems)
and)
Their Impact Upon the Existing)
Television Broadcast Service)

MM Docket No. 87-268

RECEIVED
APR 20 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

PETITION FOR RECONSIDERATION

Oro Valley 52, L.L.C. ("Oro"), by its counsel, hereby seeks reconsideration of the Commission's *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998) ("MO&O"), in the above-captioned proceeding. In support of this petition, the following is stated:

I. Background.

On July 24, 1996, Oro filed an application for a new television station to operate on Channel 52 at Oro Valley, Arizona. Oro's application included a request for waiver of the Commission's order in *Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, RM-5811, 1987 FCC LEXIS 3477 (July 17, 1987), 52 Fed.Reg. 28346 (1987) ("Freeze Order").

In its *Sixth Report and Order* in this proceeding, 12 FCC Rcd 14588 (1997), the Commission noted that, in its *Sixth Further Notice of Proposed Rulemaking*, it stated that it would not accept additional applications for new NTSC stations that were filed after September 20, 1996.¹ The

¹ See *Sixth Further Notice of Proposed Rulemaking*, 11 FCC Rcd 10968, 10992 ¶60 (1996) ("Sixth Further Notice"). Specifically, the Commission stated that it would not accept

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Commission also noted, however, that it would continue to process applications already on file and those that were filed on or before September 20, 1996, because the Commission did not believe that these applications would have a "significant negative impact" on the development of the DTV Table of Allotments. *Sixth Report and Order*, 12 FCC Rcd at 14635, ¶104. In addition, the Commission stated that when applications for new stations were accepted for filing, it would continue its practice of issuing cut-off lists announcing the opportunity to file competing, mutually-exclusive applications.²

II. The *MO&O* Failed to Protect Oro's Pending NTSC Application for Channel 52 at Oro Valley.

In its recent *MO&O*, the Commission repeatedly confirmed that it fully intended to protect pending NTSC applications filed by the September 20, 1996, deadline. *See, e.g., MO&O* at ¶¶571, 575, 608, 627. Nevertheless, the DTV Table set forth in the *MO&O* fails to protect Oro's pending NTSC application for the Channel 52 facility at Oro Valley because it is short-spaced to a co-channel DTV allotment at Tolleson, Arizona. As stated above, Oro's application for the NTSC Channel 52 facility at Oro Valley was filed months before the September 20, 1996, filing deadline. The Commission's failure to protect Oro's pending NTSC application is inconsistent with the statements the Commission made in its *Sixth Further Notice* and *Sixth Report and Order*, and the Commission neglected to provide any explanation for its failure to consider Oro's pending application in

additional applications for NTSC stations that were filed after 30 days from the publication of the *Sixth Further Notice* in the Federal Register. A summary of the *Sixth Further Notice* was published in the Federal Register on August 21, 1996. *See* 61 Fed.Reg. 43209 (1996).

² *Report and Order*, ¶104; *Sixth Further Notice*, ¶60.

establishing the DTV Table. Therefore, for this reason alone, the DTV Table contained in the *MO&O* should be revised to accommodate the existing NTSC allotment of Channel 52 at Oro Valley, Arizona, and Oro's pending application for that facility.

III. The Commission Should Substitute DTV Channel 50 for the DTV Channel 52 Allotment at Tolleson, Arizona, or, Alternatively, Oro Should be Permitted to Amend Its Pending NTSC Application to Specify an Available Alternative Channel.

As stated above, the NTSC allotment of Channel 52 at Oro Valley, Arizona is short-spaced to a co-channel DTV allotment for Station KVDR(TV), Tolleson, Arizona. Assuming, *arguendo*, the Commission should determine that its failure to consider Oro's pending NTSC application for the Channel 52 facility at Oro Valley does not constitute a sufficient basis, in itself, for granting reconsideration of the allotment of DTV Channel 52 to Tolleson, the Commission has stated throughout this proceeding that it intends to give broadcasters the flexibility to develop alternative allotment plans where they do not result in additional interference to other stations and/or allotments.

In order to accommodate Oro's pending application for the NTSC Channel 52 facility at Oro Valley, Oro respectfully requests that the Commission change the DTV allotment for Station KVDR(TV), Tolleson, from Channel 52 to Channel 50. As demonstrated in the attached engineering materials, the substitution of DTV Channel 50 for Channel 52 at Tolleson would result in Station KVDR receiving a comparable replication match, and would cause only negligible interference (less than 0.5%) to any other stations (DTV or NTSC).

The proposed substitution of DTV Channel 50 for Channel 52 at Tolleson would effectuate the Commission's pronouncements in its *Sixth Further Notice* and *Sixth Report and Order* in that it would protect those pending NTSC applications that were on file as of September 20, 1996.

IV. The Proposals Set Forth Herein Would Provide Substantial Public Interest Benefits.

The proposed substitution of DTV Channel 50 for Channel 52 at Tolleson would serve the public interest by promoting the emergence and development of new networks.³ As far back as 1941, when the Commission adopted its Chain Broadcasting Rules,⁴ a primary goal of the Commission was to remove barriers that would inhibit the development of new networks. The Commission explained that the Chain Broadcasting Rules were intended to "foster and strengthen broadcasting by opening up the field to competition. An open door to networks will stimulate the old and encourage the new." *Report on Chain Broadcasting* at 88.

The successful emergence of new networks, however, depends in large part upon their ability to attract and retain local affiliates, which is the life blood of any national network. Moreover, for

³ Oro's application for the Oro Valley facility was filed in tandem with a series of other applications which, together, cover many of the top 100 markets in which there are no full power television stations to primarily affiliate with The WB Television Network ("The WB"), with whom these respective applicants have existing affiliations. Although there is no commitment on the part of either the applicants or The WB to enter into an affiliation agreement, The WB has indicated a willingness to enter into an affiliation agreement with these applicants in the event they are successful in acquiring a station in their respective communities. It should be made clear, however, that the public interest benefit of promoting an emerging network will be achieved regardless of which applicant ultimately acquires the construction permit. The important element is that the NTSC allotment be preserved and that the station become operational and available for affiliation. By the same token, the public interest benefit of promoting emerging networks is served regardless of whether it is The WB or some other new network that gains a primary affiliate in a top 100 market.

⁴ See *Report on Chain Broadcasting*, Commission Order No. 37, Docket 4860 (May 1941) at 88 ("Report on Chain Broadcasting"); *Amendment of Part 73 of the Commission's Rules and Regulations with Respect to Competition and Responsibility in Network Television Broadcasting*, 25 FCC 2d 318, 333 (1970); *Fox Broadcasting Co. Request for Temporary Waiver of Certain Provisions of 47 C.F.R. §73.658*, 5 FCC Rcd 3211, 3211 n.9 (1990), (citing, Network Inquiry Special Staff, *New Television Networks: Entry, Jurisdiction, Ownership, and Regulation* (Vol. 1 Oct. 1980)), waiver extended, 6 FCC Rcd 2622 (1991).

emerging networks, it is critical that they be afforded the opportunity to compete for affiliates as quickly as possible. Indeed, the large financial losses that confront any national network in its initial years of operation can be stemmed only by obtaining additional affiliates to carry the emerging network's programming. In many markets, however, there simply are not enough stations to provide affiliates for emerging networks in addition to those of the more established networks. Thus, the Commission should make the requested change in the DTV Table which, by permitting an additional broadcast station to serve the market, will help promote emerging networks.

Although the Commission has noted that it is not its function to assure competitive equality in any given market, it has acknowledged its "duty at least to take such actions as will create greater opportunities for more effective competition among the networks in major markets."⁵ The history of the Commission's financial interest and syndication ("finsyn") rules provides a good illustration of how the Commission has remained steadfast in its commitment to the goal of nurturing new networks. In 1970, when the Commission first adopted the finsyn rule, it noted that "[e]ncouragement of the development of additional networks to supplement or compete with existing networks is a desirable object and has long been the policy of this Commission." *Competition and Responsibility in Network Television Broadcasting*, 25 FCC 2d at 333. More than two decades later, when the Commission first relaxed and later eliminated the finsyn rule, it did so at the behest of the

⁵ See, e.g., *Television Broadcasters, Inc.*, 4 RR 2d 119, 132 (1965) (Commission granted a short-spacing waiver to an ABC affiliate based largely upon its finding that the station had inferior facilities compared to those available to other national networks in the market, which resulted in a "serious competitive imbalance"), *recon. granted in part on other grounds*, 5 RR 2d 155 (1965); *New Orleans Television Corp.*, 32 RR 1113 (1962) (short-spacing waiver granted for the purpose of assuring the existence of a third truly competitive station in the market, thereby making available competitive facilities to the networks).

then-newest network entrant, Fox.⁶ The FCC's goal of fostering new networks also is reflected in the Commission's relaxation of its multiple ownership rules. *See Amendment of Section 73.3555 of the Commission's Rules Relating to Multiple Ownership of AM, FM, and Television Broadcast Stations*, 100 FCC 2d 17, 48 (1984) (relaxing restrictions on multiple ownership advances the Commission's diversity goal by providing alternatives to the three television networks).

The Commission also has crafted other rules and granted a variety of waivers designed to foster the development of new networks over the years. In 1967, for example, the Commission granted a waiver of the dual network rule to ABC, the then-new network entrant, in connection with ABC's four new specialized radio networks. Although operation of the four networks violated the dual network rule, the Commission nevertheless concluded that waiver of the rule was appropriate because ABC's proposal "merits encouragement as a new and imaginative approach to networking."

Proposal of American Broadcasting Cos., Inc. to Establish Four New Specialized "American Radio Networks," 11 FCC 2d 163, 168 (1967). The Commission explained that it was "of more than usual importance to encourage to the extent possible innovation and experimentation in the operation of networks." *Id.* at 165.

⁶ Pending its review of the finsyn rule, the Commission granted Fox's request for a limited waiver of the rule. *Fox Broadcasting Co.*, 5 FCC Rcd at 3211 (1990). As Commissioner Duggan explained, "Fox has been a bright and innovative force. The existence of a fourth network is certainly in the public interest. . . . Fox deserves to be encouraged." *Broadcasting & Cable*, May 7, 1990, ed., p. 28; accord, *Application of Fox Television Stations, Inc. for Renewal of License of Station WNYW-TV, New York, New York*, 10 FCC Rcd 8482, 8528-29 (1995) (Commissioner Quello stating in his concurring statement, "I believe . . . that the creation of the fourth network was a compelling public interest goal."). Similarly, in deciding to phase out the finsyn rule entirely in 1995, the Commission evaluated the rule's impact on "[t]he overall business practices of emerging networks, such as Fox, in the network television and syndication business . . . [and t]he growth of additional networks, including the development of Fox and its position vis-à-vis the three major networks." *Evaluation of Syndication and Financial Interest Rules*, 10

As these examples illustrate, the Commission has remained steadfast in its commitment to the goal of encouraging new networks. Indeed, the Commission has consistently concluded for more than fifty years that the development of new networks -- with the accompanying diversity of viewpoint that they bring -- serves the public interest. In order for emerging networks to survive, however, it is imperative that they be afforded the opportunity to compete for additional local affiliates. The requested change in the DTV Table of Allotments will help facilitate the Commission's longstanding interest in promoting the emergence of new networks by providing an additional broadcast station with which to affiliate in the market.

WHEREFORE, in light of the foregoing, Oro Valley 52, L.L.C., respectfully requests that the Commission GRANT reconsideration of its *MO&O* by substituting DTV Channel 50 for Channel 52 at Tolleson, Arizona.

Respectfully submitted,

ORO VALLEY 52, L.L.C.

By: 

Stuart Mitchell
Its Counsel

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April 20, 1998

Engineering Statement
Oro Valley, AZ Channel 52
Wes, Inc. Broadcast Consultants

The program used to demonstrate interference and service replication percentages in this study was the OET FLR program, OET Bulletin 69, running on our own Sun Microsystems computers. These computers have been verified to give identical results to the runs generated by OET. The spacing programs are our own proprietary programs utilizing the FCC broadcast database and DTV database.

Due to a digital channel Channel 52 being assigned to Tolleson, AZ 161.9 km away, a study was conducted to propose moving the digital channel 52 to channel 50. The study showed that it would receive a 100% match and would cause negligible interference to any digital or NTSC stations (less than 0.05%) and would provide a gain in population served of 509 persons over its present channel 52 DTV. This channel 50 being proposed is a lower adjacent DTV which from an engineering standpoint is a significant engineering advantage as well as obviating the need to move the digital channel down to the core after the transition period is over.

 4/19/88

Pete E Myrl Warren, III Date
Whose qualifications are a matter of
record with the Commission

TV CHANNEL SPACING STUDY

Job title: Tolleson

Latitude: 33 20 3

Channel: 50

Longitude: 112 3 38

Database file name: c:\tvsrc\tv980226.edx

| CH | Call | Record No. | City | ST | Z | STS | Bear. | Dist. | Reqd. Dist. | Result |
|-----|--------|------------|-------------------|----|---|-----|-------|-------|----------------|--------|
| 50+ | ALLOTM | 9411 | NOGALES | SO | 2 | | 154.7 | 247.4 | 280.8 | -33.4 |
| 43o | ALLOTM | 9715 | COOLIDGE | AZ | 2 | | 128.3 | 63.8 | 95.7 | -31.9 |
| 43o | NEW | 9730 | COOLIDGE | AZ | 2 | A | 118.8 | 37.8 | 95.7 | -57.9 |
| 43o | NEW | 9731 | COOLIDGE | AZ | 2 | A | 135.5 | 51.5 | 95.7 | -44.2 |
| 43o | NEW | 9732 | COOLIDGE | AZ | 2 | A | 135.8 | 51.6 | 95.7 | -44.1 |
| 45o | KUTP | 10219 | PHOENIX | AZ | 2 | L | 111.8 | .2 | 31.4 | -31.2 |
| 45o | KUTP | 10220 | PHOENIX | AZ | 2 | A | 45.0 | .2 | 31.4 | -31.2 |
| 51o | KAJW | 10222 | TOLLESON | AZ | 2 | C | .0 | .0 | 87.7 | -87.7 |
| 50o | ALLOTM | 10773 | SAN LUIS RIO COLO | SO | 2 | | 250.5 | 270.7 | 280.8 | -10.1 |

***** End of channel 50 study *****

Tolleson moved to 50 DTV

Digital Study Station: 33-20-3 N 112-3-38 W Channel 50

Study distance: 300 km

NTSC TO DTV STUDY RESULTS

| City of License | ST | Chan | Distance | Bearing | Req. Dist | Diff. |
|-----------------|----|------|----------|---------|-----------|--------|
| Green Valley | AZ | 47 | 161.97 | 129.00 | 96.60 | 65.37 |
| Kingman | AZ | 46 | 275.70 | 318.26 | 96.60 | 179.10 |
| Phoenix | AZ | 49 | 0.17 | 248.34 | <32.2 | 0.17 |
| Tolleson | AZ | 52 | 0.00 | 0.00 | <24.1 | 0.00 |
| Tucson | AZ | 42 | 149.41 | 143.68 | 96.60 | 52.81 |
| Calipatria | CA | 50 | 259.86 | 263.16 | 244.60 | 15.26 |
| El Centro | CA | 48 | 259.86 | 263.16 | 96.60 | 163.26 |

Station is in the clear!

Oro Valley-Not Included

Run begins Thu Apr 2 20:53:53 1998, host gilwell

Analysis of: 51N AZ TOLLESON

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2224197 | 31446.6 |
| not affected by terrain losses | 2208868 | 23201.3 |
| lost to NTSC IX | 479 | 48.5 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to all IX | 479 | 48.5 |

Analysis of: 52A AZ TOLLESON

HAAT 533.0 m, ATV ERP 203.8 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2224197 | 31446.6 |
| not affected by terrain losses | 2218926 | 24683.2 |
| lost to NTSC IX | 0 | 32.3 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to ATV IX only | 0 | 0.0 |
| lost to all IX | 0 | 32.3 |
| percent match ATV/NTSC | 100.0 | 100.0 |

Finished Thu Apr 2 20:59:19; run time 0:04:42

26842 calls to Longley-Rice; path distance increment 1.00 km

Study with Tolleson DTV Channel 52 moved to Digital Channel 50

Run begins Fri Apr 17 15:11:49 1998, host providence

Analysis of: 51N AZ TOLLESON

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2224197 | 31446.6 |
| not affected by terrain losses | 2208868 | 23201.3 |
| lost to NTSC IX | 479 | 48.5 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to all IX | 479 | 48.5 |

Analysis of: 50A AZ TOLLESON

HAAT 533.0 m, ATV ERP 196.9 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2224197 | 31446.6 |
| not affected by terrain losses | 2219508 | 24743.8 |
| lost to NTSC IX | 0 | 24.2 |
| lost to additional IX by ATV | 175 | 56.5 |
| lost to ATV IX only | 175 | 64.6 |
| lost to all IX | 175 | 80.8 |
| percent match ATV/NTSC | 100.0 | 99.8 |

Analysis of: 45N AZ PHOENIX

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2223174 | 28071.2 |
| not affected by terrain losses | 2211427 | 21275.5 |
| lost to NTSC IX | 9916 | 444.2 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to all IX | 9916 | 444.2 |

Analysis of: 26A AZ PHOENIX

HAAT 545.0 m, ATV ERP 64.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2223174 | 28071.2 |
| not affected by terrain losses | 2218602 | 23145.0 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 24.2 |
| lost to ATV IX only | 0 | 24.2 |
| lost to all IX | 0 | 24.2 |
| percent match ATV/NTSC | 100.0 | 100.0 |

Analysis of: 54N CA CALIPATRIA

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 227318 | 23131.5 |
| not affected by terrain losses | 225683 | 20703.6 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to all IX | 0 | 0.0 |

Analysis of: 50A CA CALIPATRIA

HAAT 507.0 m, ATV ERP 185.2 kW, direction 285.0 degrees T, F/B = 18.2 dB

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 227318 | 23131.5 |
| not affected by terrain losses | 226437 | 21323.6 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 24.0 |
| lost to ATV IX only | 0 | 24.0 |
| lost to all IX | 0 | 24.0 |
| percent match ATV/NTSC | 100.0 | 100.0 |

Analysis of: 61N AZ PHOENIX

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2214393 | 25894.8 |
| not affected by terrain losses | 2195775 | 19345.4 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 0.0 |

584
-175
509 gain over 52A

| | | |
|--------------------------------|------------|--------------|
| lost to all IX | 0 | 0.0 |
| Analysis of: 49A AZ PHOENIX | | |
| HAAT 541.0 m, ATV ERP 61.8 kW | | |
| | POPULATION | AREA (sq km) |
| within Noise Limited Contour | 2214393 | 25894.8 |
| not affected by terrain losses | 2209693 | 20548.7 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 5464 | 246.3 |
| lost to ATV IX only | 5464 | 246.3 |
| lost to all IX | 5464 | 246.3 |
| percent match ATV/NTSC | 99.8 | 99.0 |

Finished Fri Apr 17 15:30:06; run time 0:17:52
88012 calls to Longley-Rice; path distance increment 1.00 km

< 0.2% loss 2204229 Pop
again over
NTSC
of
8,454 pop

Oro Valley, AZ

Computing Tools FCC Database Reports Rev 1.4
 Digital TV Stations within 300.000 of 032-24-54 110-42-59
 Accuracy and completeness of these results is NOT assured.

| St City | channel | latitude | longitude | distance, (km), | bearing (degrees) |
|-----------------|---------|----------|-----------|--------------------|----------------------|
| NM Silver City | 12 | 32-51-46 | 108-14-28 | 237.514, | 77.93238 |
| AZ Phoenix | 17 | 33-20-02 | 112-03-40 | 161.933, | 308.99811 |
| AZ Flagstaff | 18 | 34-58-04 | 111-30-30 | 292.504, | 345.46124 |
| AZ Tucson | 19 | 32-14-55 | 111-06-57 | 41.891, | 243.86776 |
| AZ Phoenix | 20 | 33-20-02 | 112-03-42 | 161.974, | 308.98653 |
| AZ Flagstaff | 22 | 34-58-06 | 111-30-28 | 292.551, | 345.47408 |
| AZ Tucson | 23 | 32-24-56 | 110-42-49 | 0.268, | 76.73365 |
| AZ Phoenix | 24 | 33-20-01 | 112-03-45 | 162.015, | 308.96067 |
| AZ Prescott | 25 | 34-41-15 | 112-07-01 | 283.628, | 332.70376 |
| AZ Tucson | 25 | 31-42-18 | 110-55-26 | 81.130, | 193.97664 |
| AZ Phoenix | 26 | 33-20-01 | 112-03-32 | 161.752, | 309.03594 |
| AZ Flagstaff | 27 | 34-58-05 | 111-30-29 | 292.528, | 345.46766 |
| AZ Tucson | 28 | 32-12-53 | 111-00-21 | 35.159, | 230.82764 |
| AZ Phoenix | 29 | 33-20-00 | 112-03-49 | 162.077, | 308.92904 |
| AZ Tucson | 30 | 32-24-55 | 110-42-54 | 0.134, | 76.73367 |
| AZ Phoenix | 31 | 33-20-03 | 112-03-43 | 162.013, | 308.98926 |
| AZ Tucson | 32 | 32-14-56 | 111-06-58 | 41.901, | 243.92129 |
| NM Silver City | 33 | 32-46-12 | 108-16-41 | 232.277, | 80.24218 |
| AZ Phoenix | 34 | 33-20-00 | 112-03-46 | 162.016, | 308.94637 |
| AZ Tucson | 35 | 32-24-54 | 110-42-59 | 0.000, | 0.00000 |
| AZ Mesa | 36 | 33-20-00 | 112-03-48 | 162.056, | 308.93482 |
| AZ Tucson | 42 | 32-14-55 | 111-06-57 | 41.891, | 243.86776 |
| AZ Sierra Vista | 44 | 31-45-33 | 110-48-02 | 73.155, | 186.23557 |
| AZ Green Valley | 47 | 32-24-54 | 110-42-56 | 0.078, | 90.00000 |
| AZ Phoenix | 49 | 33-20-01 | 112-03-44 | 161.995, | 308.96645 |
| AZ Tolleson | 52 | 33-20-03 | 112-03-38 | 161.912, | 309.01820 |
| AZ Phoenix | 56 | 33-20-00 | 112-03-46 | 162.016, | 308.94637 |

End of report.

(34) 29 24

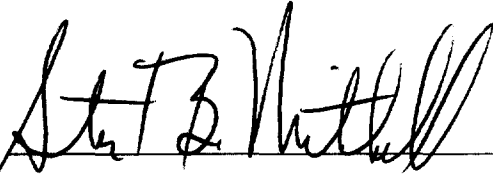
CERTIFICATE OF SERVICE

I, Stuart Mitchell, hereby certify that on this 20th day of April, 1998, copies of the foregoing "Petition for Reconsideration" were hand delivered or mailed first-class, postage pre-paid, to the following:

Roy J. Stewart, Chief*
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 314
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Barbara A. Kreisman, Chief*
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America 51, L.P.
11 West Medlock
Phoenix, AZ 85013


A handwritten signature in cursive script, reading "Stuart Mitchell", is written over a horizontal line. A diagonal line extends from the bottom left of the signature down towards the bottom left of the page.

* Hand Delivered